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January 20, 2015

## Via ECF

The Honorable Nina Gershon, U.S.D.J.  
United States District Court  
for the Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East, Room 1217  
Brooklyn, NY 11201

Re: Michael Sabella v. American Stevedoring, Inc. et al.; 06-CV-6566

Dear Judge Gershon:

I would like to request a two week adjournment of the post-trial motions opposition briefs due date (presently January 23, 2015) for both Plaintiff and Defendant ASI in the above-referenced matter. Mr. Blit, representing Plaintiff, has consented to same, and Mr. Sheridan, representing Local 1814, has also given his consent.

On the Tuesday after trial, November 25, 2014, I suffered a severed tendon in my right hand (I am right handed), which resulted from surgery for a broken wrist last year. This new complication required me to have surgery again on December 18, 2014. I am still recuperating and my hand is in a splint, making everything quite difficult. As well, my husband is having surgery on Friday, January 23, 2015, when the brief is due. I would greatly appreciate an extra two weeks to complete the opposition brief.

I anticipate that the reply briefs would still be due one week later, and thus the revised due dates would be February 6 for the opposition briefs and February 13 for the reply briefs.

**SZAFERMAN  
LAKIND**

If Your Honor has any questions regarding this request, please call me.

Sincerely,

A handwritten signature in cursive script, reading "Janine G. Bauer/sj".

Janine G. Bauer

Attorney for American Stevedoring, Inc.